



E-learning webinar:

Event Code: EWEB22061601

## **BEPS 2.0 Pillar Two Commentary**

### **- Guidance on interpretation and application of the Model Rules**

#### **About the topic**

On 14 March 2022, the Organisation for Economic Co-operation and Development (OECD) released the Commentary and illustrative examples to the Pillar Two Model Rules under the Base Erosion and Profit Shifting (BEPS 2.0) initiative. The Commentary provides guidance on the interpretation and application of the Model Rules that were released in December 2021 to define the scope and set out the mechanism for the global anti-base erosion (GloBE) rules under Pillar Two. The aim is to introduce a global minimum corporate tax rate of 15%, effective from 2023.

The Commentary provides multinationals and tax administrations with details and comprehensive technical guidance on the operation and intended outcomes under the GloBE rules and clarifies some outstanding issues. It also illustrates the application of the GloBE rules to various fact patterns.

In this live webinar, the speakers will:

- Briefly explain the background of Pillar Two under BEPS 2.0
- Highlight the key observations in the Commentary
- Share some insights on the potential changes to the Hong Kong tax system
- Discuss the potential impacts on multinationals and analyse how they should get prepared

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#### **About the event**

<b>Date &amp; time</b>	<b>Thursday, 16 June 2022</b> <b>6:00 p.m. – 7:00 p.m.</b>
<b>Format</b>	<b>Live webinar</b>
<b>Fee</b>	<ul style="list-style-type: none"><li>• Taxation Faculty member: HK\$100</li><li>• HKICPA member or student; and IA: HK\$120</li><li>• Non-member: HK\$220</li></ul> <i>Not a faculty member? Click <a href="#">here</a> to join.</i>
<b>Language</b>	English
<b>HKICPA CPD credit</b>	1 hour (subject to actual attendance)
<b>Rating</b>	Advanced level*
<b>Competency</b>	Taxation*
<b>Application deadline</b>	<b>Online registration by 13 June 2022</b> (offline registration by 9 June 2022)

#### **Speaker**

##### **Sangeeth Aiyappa**

Partner, International Tax and  
Transaction Services, Ernst &  
Young Tax Services Limited

##### **Ed Raza**

Director, Tax Accounting Risk  
Advisory Services, Ernst & Young  
Tax Services Limited

##### **Sharon To**

Member, Taxation Faculty  
Member Services Sub-committee,  
and Director, International Tax  
and Transaction Services, Ernst &  
Young Tax Services Limited

\* Please refer [here](#) for descriptions of the various ratings.



## About the speaker

### **Sangeeth Aiyappa**

**Partner, International Tax and Transaction Services, Ernst & Young Tax Services Limited**

Sangeeth has over 16 years of transfer pricing experience with Ernst & Young, managing large multi-jurisdictional tax restructuring, implementation and controversy projects. She has been involved in a wide range of transfer pricing projects covering tangible, intangible and service transactions. Sangeeth advises on cross-border tax structuring projects with respect to restructuring of principal/hub structures, IP alignment, setting up systems for efficient service cost allocations, evaluating alternative operating models and redesigning transfer pricing policies/models. This is matched with her expertise in managing global/regional multi-jurisdictional transfer pricing compliance/managed services.

Sangeeth leads several controversy projects involving tax authority discussions and determining audit defence strategies, including transfer pricing enquiries and audits, Exchange of Information (EOI) requests, and APAs. She also has experience in applying non-standard methods in the field of transfer pricing. Projects include trademark valuation with regression, intangibles valuation through real options, laffer curve analysis in the context of determining the optimal tax rate, and regression models to estimate arm's length profits.

Sangeeth's sector focus covers: Consumer products, technology/media, life sciences and hospitality.

### **Ed Raza**

**Director, Tax Accounting Risk Advisory Services, Ernst & Young Tax Services Limited**

Ed has over 15 years of tax accounting experience, specializing in U.S. GAAP (ASC 740) and IFRS (IAS 12). He was previously based in EY New York Offices for 10 years before moving to EY Hong Kong in 2016. Ed has a wide range of experience in tax accounting, including purchase price accounting, regulatory accounting changes, income tax provision process redesign and corporate governance. In the Hong Kong market, he has led Global IFRS 17 / 9 Tax Accounting implementation for global (re)insurers, GRI-207 tax disclosures, deferred tax validation and tax planning. Ed is actively involved with the Institute, Insurance Regulatory Advisory Panel and Hong Kong Capital Markets Tax Committee on a number of IAS 12, ASC 740 related issues for Hong Kong taxpayers. Sector expertise: consumer products, hospitality, financial services.

### **Sharon To**

**Director, International Tax and Transaction Services, Ernst & Young Tax Services Limited**

Sharon has more than 14 years of professional experience in tax and business advisory. She provides tax and business advices to multinational companies in different sectors, including real estate, natural resources, food & beverage, hospitality and consumer products.

Sharon advises on cross border transactions and structuring including inbound and outbound investments in the APAC region, tax treaty interpretations, outbound remittance and tax structuring, etc. She also provides clients with Hong Kong and China tax due diligence services.

## Registration

- **Online enrolment by 13 June; offline enrolment by post or e-mail also by 9 June:**

Complete the enrolment form and return it to the Institute by 9 June, together with full payment. Cheque should be made payable to "Hong Kong Institute of Certified Public Accountants" or "HKICPA". E-mail registration will be accepted for payment by any VISA/ Master card or the BOC HKICPA UnionPay card.

**You may consider your registration to be successful unless you receive notification from us to the contrary.**

- Upon successful enrolment, the meeting URL and login password will be provided nearer the event date.
- **Contact Mr. Marco Yip at 2287-7009 or Mr. Bryan Kwok at 2287-7057 for enquiry.**